

3

ACNP

American
College of
Nuclear
Physicians

California
Chapter

Dorothy Duffy Price
Executive Director

Box 31
Los Altos, CA 94023

TEL (415) 949-1341
FAX (415) 949-1341

November 9, 1998

The Honorable Shirley Ann Jackson
Chairman, U.S. Nuclear Regulatory Commission
Mail Stop 016G15
Washington, DC 20555

Dear Chairman Jackson:

Enclosed is the response and comments of the California Chapter of the American College of Nuclear Physicians (ACNP) to the NRC's proposed revision of 10 CFR Part 35. This response was developed by our Government Relations Committee and approved by our Executive Committee.

The California Chapter of the ACNP believes that the proposed revision of Part 35 is seriously flawed and that a one year delay is required in order to resolve the many outstanding problems. This could not be accomplished in the public hearings because responses were severely limited by the frame of reference and restricted questions imposed unilaterally by the NRC's "Working Group" and "Steering Group". The California Chapter believes that the restrictive format is a large handicap that prevents us from commenting on each of the proposed new regulations. Our response, therefore, takes the form of an Executive Summary of our comments and concerns followed by a detailed discussion of these matters with suggested language for many revised regulations.

A one year delay in the revision of Part 35 should give ample time for the success of a good faith effort of the NRC and concerned professional organizations to resolve the many remaining problems.

Sincerely yours,

Marvin B. Cohen

Marvin B. Cohen, M.D.
President, California Chapter
American College of Nuclear Physicians